

United States District Court

for the
Western District of New York

United States of America

v.

Case No. 22-MJ- 4147

WILLIAM M. PUTNAM,

Defendants.

CRIMINAL COMPLAINT

I, MATTHEW TOBIN, the complainant in this case, state that the following is true to the best of my knowledge and belief.

The defendant, on or about November 15, 2022, in the City of Rochester, County of Monroe, Western District of New York, violated Title 18, United States Code, Section 875(c) by transmitting in interstate commerce communications containing threats to injury the person of another.

This Criminal Complaint is based on these facts:

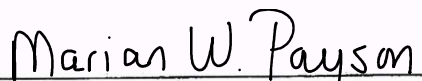
SEE ATTACHED AFFIDAVIT OF MATTHEW TOBIN, SA, FBI

☒ Continued on the attached sheet.


Complainant's signature

MATTHEW TOBIN, SA, FBI
Printed name and title

Affidavit submitted electronically by email in .pdf format.
Oath administered, and contents and signature, attested
to me telephonically pursuant to Fed. R. Crim. P. 4.1 and
4 (d) on November 22, 2022.


Judge's signature

HONORABLE MARIAN W. PAYSON
UNITED STATES MAGISTRATE JUDGE
Printed name and title

City and State: Rochester, New York

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v -

22-MJ-4147

WILLIAM M. PUTNAM,

Defendant.

STATE OF NEW YORK)
COUNTY OF MONROE) SS:
CITY OF ROCHESTER)

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, MATTHEW TOBIN, being duly sworn, depose and state the following:

INTRODUCTION

1. I am a Special Agent with the Federal Bureau of Investigation (FBI), and have served in this capacity for approximately two years. I am currently assigned to the Joint Terrorism Task Force (JTTF), Buffalo Division, in Rochester, New York. At the JTTF, I work with a team of federal, state, and local law enforcement agents and officers on investigations relating to domestic and international terrorism. During my tenure with the FBI, I have also attended intensive training on counterterrorism and other types of investigations, including counterintelligence, white collar crime, public corruption, organized crime, and narcotics. I am familiar with digital evidence commonly possessed and used by those involved in criminal activities. I have also conferred with other FBI Special Agents who have expertise and experience in counterterrorism investigations and digital evidence.

2. I make this affidavit in support of a criminal complaint charging WILLIAM M. PUTNAM with a violation of 18 U.S.C. § 875(c) (transmitting in interstate commerce communications containing threats to injure the person of another). The assertions made herein are based on my personal knowledge and observations, my training and experience, conversations that I have had with other law enforcement officers, victims, and witnesses, and my review of documents and records, all of which are true and correct to the best of my knowledge and belief. Further, I have had discussions with law enforcement officers involved in this investigation who have confirmed the accuracy of the information contained within this affidavit. Since this affidavit is being submitted for a limited purpose, I have not included each and every fact that I know concerning this investigation. Rather, I have set forth only the facts that relate to the issue of whether probable cause exists to believe that PUTNAM committed the above-described offenses.

FACTS ESTABLISHING PROBABLE CAUSE

3. WILLIAM M. PUTNAM is a 53-year-old male who currently resides at 571 Lake Avenue, Rochester, New York. On November 21, 2022, a board member of the Islamic Center of Rochester (Victim 1) became aware of a voicemail on his personal cell phone from telephone number 585-705-7374. The voicemail, which had been left on November 15, 2022, at approximately 1:23 p.m., consisted of the following voice message left by a male individual:

"I'm coming to your office with a few friends, we all have shotguns. We are walking into your front door, and we are going to shoot everybody that's on the phone in the fucking head. How do you like that? That's what's going coming your way very soon, you scumbag foreigner piece of shit."

4. A search of public records revealed telephone number 585-705-7374 likely belonged to WILLIAM PUTNAM, address 571 Lake Avenue, Rochester, New York. NCIC records indicated PUTNAM has twelve previous criminal convictions, to include two felony convictions and one violent felony conviction. Rochester Police Department records revealed that in November 2021, PUTNAM had been the subject of a Mental Health Transport for threatening self-harm. In addition, Putnam had previously provided telephone number 585-705-7374 as his personal number to Rochester Police Department.

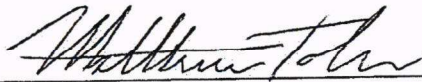
5. Victim 1 was provided with a photo of PUTNAM and recognized him as an individual named "William" who had previously visited the Islamic Center and who had interacted with Victim 1 on multiple occasions since 2021.

6. As a result of the above information, on November 21, 2022, Rochester Police Department officers took PUTNAM into custody at his residence at 571 Lake Avenue under New York Mental Hygiene Law § 9.45 and transported PUTNAM to Rochester General Hospital for observation, care, and treatment.

7. Bodycam footage captured PUTNAM's interaction with RPD officers. During this interaction, PUTNAM spoke with officers for several minutes and provided telephone number 585-705-7374 as his personal phone number. I reviewed the bodycam footage and determined that PUTNAM's voice is the same as the voice of the male individual who left the voicemail on Victim 1's cellphone.

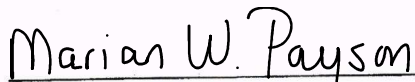
CONCLUSION

8. Wherefore, based on the above information, I submit there is probable cause to believe that, on or about November 15, 2022, WILLIAM M. PUTNAM committed a violation of 18 U.S.C. § 875(c).



MATTHEW TOBIN
Special Agent
Federal Bureau of Investigation

Affidavit and Criminal Complaint submitted electronically by email in .pdf format. Oath administered, and contents and signature, attested to me as true and accurate telephonically pursuant to Fed.R.Crim.P. 4.1 and 4(d) on this 22nd day of November.



HONORABLE MARIAN W. PAYSON
United States Magistrate Judge